

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

IN RE: JOHN THOMAS MOORE, JR Debtor	Case No. 23-10084-amc
Freedom Mortgage Corporation, Movant	Chapter 13
vs. JOHN THOMAS MOORE, JR Respondent	11 U.S.C. §362

CERTIFICATION OF DEFAULT

BROCK AND SCOTT, PLLC, attorneys for Movant, hereby certifies that the above-captioned Debtor has failed to comply with the terms of the Stipulation approved by the U.S. Bankruptcy Judge on January 11, 2024.

In accordance with the terms of said Stipulation agreed to by the parties, the Automatic Stay is hereby lifted as to permit Movant to proceed with their State Court remedies upon Debtor's failure to cure the default.

/s/Ryan Starks

Andrew Spivack, PA Bar No. 84439
Matthew Fissel, PA Bar No. 314567
Mario Hanyon, PA Bar No. 203993
Ryan Starks, PA Bar No. 330002
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Philadelphia Division

IN RE:

JOHN THOMAS MOORE, JR

Case No. 23-10084-amc

Chapter 13

Freedom Mortgage Corporation,

Movant

vs.

JOHN THOMAS MOORE, JR ,

Debtor

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Certification of Default has been electronically served or mailed, postage prepaid on this day to the following:

Via Electronic Notice:

MICHAEL A. CIBIK, Debtor's Attorney
1500 Walnut Street
Suite 900
Philadelphia, PA 19102
mail@cibiklaw.com

SCOTT F. WATERMAN [Chapter 13], Bankruptcy Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

Office of the U.S. Trustee, US Trustee
Robert N.C. Nix Federal Building
900 Market Street, Suite 320
Philadelphia, PA 19107

Via First Class Mail:

JOHN THOMAS MOORE, JR
1549 66TH AVE
PHILADELPHIA, PA 19126-2766

Date: August 28, 2024

/s/Ryan Starks
Andrew Spivack, PA Bar No. 84439
Matthew Fissel, PA Bar No. 314567
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